

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL BARTH and MAUREEN	:	
BARTH, individually and as husband and	:	CASE NO. 2:16-CV-02140-RK
wife,	:	
	:	<b>DEFENDANTS' MOTION TO DISMISS</b>
Plaintiffs,	:	<b>FOR LACK OF PERSONAL</b>
	:	<b>JURISDICTION</b>
v.	:	
	:	<b>Document Filed Electronically</b>
WALT DISNEY PARKS AND RESORTS	:	
U.S., INC. and THE WALT DISNEY	:	
COMPANY,	:	
	:	
Defendants.	:	

Defendants Walt Disney Parks and Resorts U.S., Inc. and The Walt Disney Company (“Defendants”), by and through their undersigned counsel, hereby move to dismiss Plaintiffs’ Complaint pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure for lack of personal jurisdiction. In support of their motion, Defendants rely on the accompanying Brief In Support Of Defendants’ Motion To Dismiss For Lack Of Personal Jurisdiction, the Certification of Marsha L. Reed, and the Certification of Scott Justice, which are incorporated herein by reference in their entirety.

WHEREFORE, Defendants respectfully request that the Court enter an Order in the form proposed herewith granting Defendants’ motion to dismiss for lack of personal jurisdiction and dismissing this case.

Respectfully submitted

Dated: June 9, 2016

s/Frederick P. Marczyk  
Frederick P. Marczyk  
Attorney Identification No. 89878  
DRINKER BIDDLE & REATH LLP  
*A Delaware Limited Liability Partnership*  
One Logan Square, Ste. 2000

Philadelphia, PA 19103-6996  
Phone: (215) 988-2700  
Fax: (215) 988-2757  
E-mail: [frederick.marczyk@dbr.com](mailto:frederick.marczyk@dbr.com)

*Attorney for Defendants Walt Disney Parks  
and Resorts U.S., Inc. and The Walt Disney  
Company*